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7 Attorney for Defendants Bob Weinstein, Harvey Weinstein,
8 Miramax Films NY, LLC, f/k/a Miramax Film Corp., Visiona
9 Romantica, Inc., The Weinstein Company, Lawrence
10 Bender Productions and The Walt Disney Company

11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL OF CALIFORNIA

13 DANNEZ HUNTER,
14 Plaintiff

15 vs.

16 QUENTIN TARANTINO, an individual;
17 BOB WEINSTEIN, an individual;
18 HARVEY WEINSTEIN, an individual;
19 MIRAMAX FILM CORP., a corporation;
20 VISIONA ROMANTICA, INC., a corporation;
21 THE WEINSTEIN COMPANY, a corporation; A
22 BAND APART, a corporation; LAWRENCE
23 BENDER PRODUCTIONS, a corporation;
24 LAWRENCE BENDER; WALT DISNEY, a
25 corporation; and JOHN DOES 1 through 10,
26 sued in their individual and official capacities

27 Defendants.

CV10 3387 SJO PJWx

NOTICE OF REMOVAL OF ACTION UNDER
28 U.S.C. § 1441(b)

(Federal Question)

DEMAND FOR JURY TRIAL

28 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE THAT defendants Bob Weinstein, Harvey Weinstein, Miramax
Films NY, LLC, formerly known as Miramax Film Corp., Visiona Romantica, Inc., The Weinstein
Company, Lawrence Bender Productions and The Walt Disney Company (mistakenly referred
to as "Walt Disney" in the caption of plaintiff's complaint and as "The Walt Disney Corporation"

2010 MAY -6 AM 11:19
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

FILED

1 in the body of plaintiff's complaint) hereby remove to this Court the state court action described
2 below:

3 1. On March 18, 2010 an action designated as Los Angeles Superior Court Case No.
4 BC433381 was commenced in the Superior Court of the State of California in and for the
5 County of Los Angeles entitled "Dannez Hunter, Plaintiff, vs. Quentin Tarantino, *et al.*,
6 Defendants." Copies of the documents contained in the state court file are attached hereto as
7 Exhibit A and include the following:
8

- 9 (1) Civil Case Cover Sheet
- 10 (2) Civil Complaint
- 11 (3) Affidavit of Dannez Hunter in Support of Civil Complaint
- 12 (4) Order on Court Fee Waiver
- 13 (5) First Amended Civil Complaint
- 14 (6) Notice of Case Management Conference
- 15 (7) Notice of Order to Show Cause Hearing
- 16 (8) Proof of Service of Process on Miramax Film Corp.
- 17 (9) Proof of Service of Process on Visiona Romantica, Inc.
- 18

19 2. The earliest date upon which any of the defendants received a copy of said complaint
20 was April 6, 2010. On that date defendant Miramax Films NY, LLC, formerly known as
21 Miramax Film Corp. ("Miramax"), was served with a copy of the First Amended Civil Complaint
22 and a summons from said state court. Copies of the summons and First Amended Civil
23 Complaint served on Miramax are attached hereto as Exhibit B.
24

25 3. This action is a civil action of which this court has original jurisdiction under 28 U.S.C.
26 § 1331 and is one that may be removed to this Court by defendants pursuant to 28 U.S.C. §
27 1441(b) in that it arises under the following statutes:
28

- (a) 17 U.S.C. §§ 501, 506 and 2319
- (b) 18 U.S.C. §§ 2318
- © 42 U.S.C. §§ 1981, 1982 and 1983
- (d) 15 U.S.C. § 1125
- (e) 15 U.S.C. §§ 1 and 2.
- (f) 18 U.S.C. § 1961
- (g) 22 USC §§ 2201 and 2202

4. All defendants who have been served are represented by the undersigned counsel and have joined in this Notice of Removal. The undersigned counsel also represents defendants Quentin Tarantino and Lawrence Bender. They have also consented to this removal but have not yet been served. The plaintiff has also named a purported corporation identified as a "A Band Apart" as a defendant, but no such entity exists.

Dated: May 4, 2010



Thomas H. Edwards

Attorney for Defendants Bob Weinstein, Harvey Weinstein,
Miramax Films NY, LLC, f/k/a Miramax Film Corp.,
Visiona Romantica, Inc., The Weinstein Company, Lawrence
Bender Productions and The Walt Disney Company

DEMAND FOR JURY TRIAL

Defendants Bob Weinstein, Harvey Weinstein, Miramax Films NY, LLC, f/k/a Miramax Film Corp., Visiona Romantica, Inc., The Weinstein Company, Lawrence Bender Productions and The Walt Disney Company hereby demand a jury trial as provided by Rule 38(a) of the Federal Rules of Civil Procedure.



Dated: May 4, 2010

Thomas H. Edwards

Attorney for Defendants Bob Weinstein, Harvey Weinstein,
Miramax Films NY, LLC, f/k/a Miramax Film Corp.,
Visiona Romantica, Inc., The Weinstein Company, Lawrence
Bender Productions and The Walt Disney Company

EXHIBIT A

A-1

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Dannez Hunter 3414 W. Washington Blvd. Ste #2 L.A. CA 90018 TELEPHONE NO.: 323-203-4371 FAX NO.:		CM-010 FOR COURT USE ONLY <div style="border: 2px solid black; padding: 5px; margin: 10px auto; width: 150px;"> FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES MAR 08 2010 John A. Clarke, Executive Officer/Clerk By <u>Mary E. Garcia</u> Deputy </div>	
ATTORNEY FOR (Name): SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90018 BRANCH NAME: Central District of California			
CASE NAME: Dannez Hunter vs. Quentin Tarantino			
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000)		<input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	
<input type="checkbox"/> Counter		<input type="checkbox"/> Joinder	
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)		CASE NUMBER: BC 488381	
JUDGE:		DEPT:	

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:		
Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PIP/D/W (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PIP/D/W (23) Non-PIP/D/W (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input checked="" type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PIP/D/W tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☐ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (specify):
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: 03/08/12

Dannez Hunter

(TYPE OR PRINT NAME)

Dannez Hunter

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

- NOTICE**
- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
 - File this cover sheet in addition to any cover sheet required by local court rule.
 - If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
 - Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

 Form Adopted for Mandatory Use
 Judicial Council of California
 CM-010 (Rev. July 1, 2007)

CIVIL CASE COVER SHEET

 Cal. Rules of Court, rules 2.30, 3.220, 3.400-3.403, 3.740;
 Cal. Standards of Judicial Administration, s.d. 3.10
www.courtinfo.ca.gov

 American LegalNet, Inc.
www.FormaWorkflow.com

CM-010

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort Auto (22)—Personal Injury/Property Damage/Wrongful Death Uninsured Motorist (46) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort Asbestos (04) Asbestos Property Damage Asbestos Personal Injury/Wrongful Death Product Liability (not asbestos or toxic/environmental) (24) Medical Malpractice (45) Medical Malpractice—Physicians & Surgeons Other Professional Health Care Malpractice Other PI/PD/WD (23) Premises Liability (e.g., slip and fall) Intentional Bodily Injury/PD/WD (e.g., assault, vandalism) Intentional Infliction of Emotional Distress Negligent Infliction of Emotional Distress Other PI/PD/WD Non-PI/PD/WD (Other) Tort Business Tort/Unfair Business Practice (07) Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08) Defamation (e.g., slander, libel) (13) Fraud (16) Intellectual Property (19) Professional Negligence (25) Legal Malpractice Other Professional Malpractice (not medical or legal) Other Non-PI/PD/WD Tort (35) Employment Wrongful Termination (36) Other Employment (15)	Contract Breach of Contract/Warranty (06) Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) Contract/Warranty Breach—Seller Plaintiff (not fraud or negligence) Negligent Breach of Contract/Warranty Other Breach of Contract/Warranty Collections (e.g., money owed, open book accounts) (09) Collection Case—Seller Plaintiff Other Promissory Note/Collections Case Insurance Coverage (not provisionally complex) (18) Auto Subrogation Other Coverage Other Contract (37) Contractual Fraud Other Contract Dispute Real Property Eminent Domain/Inverse Condemnation (14) Wrongful Eviction (33) Other Real Property (e.g., quiet title) (26) Writ of Possession of Real Property Mortgage Foreclosure Quiet Title Other Real Property (not eminent domain, landlord/tenant, or foreclosure) Unlawful Detainer Commercial (31) Residential (32) Drugs (38) (if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential) Judicial Review Asset Forfeiture (05) Petition Re: Arbitration Award (11) Writ of Mandate (02) Writ—Administrative Mandamus Writ—Mandamus on Limited Court Case Matter Writ—Other Limited Court Case Review Other Judicial Review (39) Review of Health Officer Order Notice of Appeal—Labor Commissioner Appeals	Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403) Antitrust/Trade Regulation (03) Construction Defect (10) Claims Involving Mass Tort (40) Securities Litigation (28) Environmental/Toxic Tort (30) Insurance Coverage Claims (arising from provisionally complex case type listed above) (41) Enforcement of Judgment Enforcement of Judgment (20) Abstract of Judgment (Out of County) Confession of Judgment (non-domestic relations) Sister State Judgment Administrative Agency Award (not unpaid taxes) Petition/Certification of Entry of Judgment on Unpaid Taxes Other Enforcement of Judgment Case Miscellaneous Civil Complaint RICO (27) Other Complaint (not specified above) (42) Declaratory Relief Only Injunctive Relief Only (non-harassment) Mechanics Lien Other Commercial Complaint Case (non-tort/non-complex) Other Civil Complaint (non-tort/non-complex) Miscellaneous Civil Petition Partnership and Corporate Governance (21) Other Petition (not specified above) (43) Civil Harassment Workplace Violence Elder/Dependent Adult Abuse Election Contest Petition for Name Change Petition for Relief From Late Claim Other Civil Petition
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CM-010 (Rev. July 1, 2007)

CIVIL CASE COVER SHEET

Page 2 of 2

00007

SHORT TITLE: Dannez Hunter vs. Quentin Tarantino	CASE NUMBER BC 433381
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**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL _____ ☐ HOURS/ ☐ DAYS

Item II. Select the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet Form, find the main civil case cover sheet heading for your case in the left margin below, and, to the right in Column A, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column B below which best describes the nature of this case.

Step 3: In Column C, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- | | |
|--|--|
| 1. Class Actions must be filed in the County Courthouse, Central District. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in Central (Other county, or no Bodily Injury/Property Damages). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office. |

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (48)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death - Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress		1., 2., 3.	
<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1., 2., 4.	
Non-Personal Injury/Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
	Civil Rights (08)	<input checked="" type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input checked="" type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.

Non-Personal Injury/Property Damage/
Wrongful Death Tort (Cont'd.)

Employment

Contract

Real Property

Judicial Review Unlawful Detainer

SHORT TITLE: Dannez Hunter vs. Quentin Tarantino		CASE NUMBER
A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons -See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 8. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels_____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer- Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 8.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

SHORT TITLE: Dannez Hunter vs. Quentin Tarantino		CASE NUMBER	
Judicial Review (Cont'd.)	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	
	C Applicable Reasons - See Step 3 Above		
Provisionally Complex Litigation	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
	RICO (27)	<input checked="" type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Miscellaneous Civil Complaints	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
	Partnership Corporation Governance(21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Miscellaneous Civil Petitions	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

SHORT TITLE: Dannez Hunter vs. Quentin Tarantino	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: Visiona Romantica, Inc 11812 San Vicente Blvd., 4th Floor	
CITY: Los Angeles,	STATE: CA	ZIP CODE: 90049	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Central courthouse in the Los Angeles District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subds. (b), (c) and (d)).

Dated: _____


(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev. 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

A-2

FILED IN FORMA PAUPERIS (CRC 985)

PER ORDER DATED

AMOUNT RECOVERABLE PLUS AMOUNT
TO \$8511.3 GC \$PLUS A ONE TIME ADMINISTRATIVE FEE UPON JUDGMENT
IF THE PARTY BECOMES A JUDGMENT CREDITOR.**FEE WAIVER****DANNEZ HUNTER****3414 W. Washington Blvd, Ste #2****L.A., C.A. 90018****323-203-4371 (CELL)****dannezhunter@yahoo.com****IN PROPRIA PERSONA****FILED**
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

MAR 08 2010

John A. Clarke, Executive Officer/Clerk
By Mary E. Garcia, Deputy
MARY E. GARCIA**SUPERIOR COURT OF CALIFORNIA
CENTRAL DISTRICT
COUNTY OF LOS ANGELES****DANNEZ HUNTER,
PLAINTIFF,****v.****QUENTIN TARANTINO, an
individual; BOB WEINSTEIN, an
individual, HARVEY WEINSTEIN,
an individual, MIRAMAX, a
corporation, VISIONA
ROMANTICA, INC., a corporation;
THE WEINSTEIN COMPANY, a
corporation, ABAND APART, a
corporation LAWRENCE BENDER
PRODUCTIONS, a corporation
WALT DISNEY, a corporation,
CARLOS GOODMAN, BLOOM
HERGOTT, COMPANY AND
JOHN DOES 1 THROUGH X
SUED IN THEIR INDIVIDUAL AND
OFFICIAL CAPACITIES
DEFENDANTS.**

Case No.

BC 433381**CIVIL COMPLAINT**

- (1) 18 USC 201
- (2) 17 USC 506 Felony Copyright Infringement
- (3) Race Discrimination 42 U.S.C. 1983
- (2) UNFAIR COMPETITION
- (3) MONOPOLY
- (4) CIVIL RICO
- (5) ACCOUNTING
- (8) 18 U.S.C. 1961 et. seq.
- (9) The Intellectual Property Protection and Courts Amendments Act of 2004
- (10) Declaratory Judgment that

**PAu002655537 is Invalid due to
a Fraudulent Registration
Submitted by Owner to the US
Copyright Office****(6) "[JURY TRIAL IS
DEMANDED]"**

MAR 08 2010

PRELIMINARY STATEMENT

COMES NOW, Dannez Hunter bringing forth this Civil Rights and RICO complaint against Defendants Quentin Tarantino, Miramax, Visiona Romantica, Inc., The Weinstein Company, A Band Apart, Lawrence Bender, Lawrence Bender Productions, Walt Disney, Carlos Goodman and John Does I through X, pursuant to 15 U.S.C. §1, 17 U.S.C. §106 Article 1, Section 8, Clause 7 of the U.S. Constitution, 17 U.S.C. §201, 17 U.S.C. §408d, 17 U.S.C. §501, 17 U.S.C. §506, 17 U.S.C. §506(e), 18 U.S.C. §1001, 18 U.S.C. §1001(a)(1), 18 U.S.C. §1341, 18 U.S.C. §1641, 18 U.S.C. §1967, 18 U.S.C. §2319), 42 U.S.C. §§1983-- Discrimination based on Race, Unfair Business Practices Act, Unfair Competition, Civil RICO, Buchwald v. Paramount Pictures, 1990 WL 357611 (Cal. Superior); (Dezendorf vs. Twentieth Century Fox, SD.Cal., 1940, 32 F.Supp. 359, Aff'd 9Cir., 118F.2d 561; Lockheed Information Management Systems Co. v. Maximus, Inc., 259 Va. 92 (2000); Bridgeport Music Inc. v. Bad Boy 507 F.3d 470 (6th Cir. 2007) The Intellectual Property Protection and Courts Amendments Act of 2004 Anti-counterfeiting Amendments Act of 2004, (b) essentially alleging that defendants established a pattern of racketeering for the purpose of deceiving the consuming public into believing that some defendants created the story concept in the "Kill Bill" film when, in fact, that concept and specifically the character O-Ren Ishii was stolen from an inner city African American youth. (Exh. Affidavit of Dannez Hunter)

JURISDICTION

1. Jurisdiction exists, in whole and/or in part, pursuant to the following federal statutes: (a) 28 U.S.C. 1331 as the complaint alleges federal questions, (b) 28 U.S.C. 1332 as exceeds \$75,000 exclusive of costs and interest and the amount in controversy, (c) 28 U.S.C. 2201-2202 as the complaint seeks a declaratory judgment of rights under registered copyrights, and 28 U.S.C. 1338 (a) as to copyright claims, and 28 U.S.C. 1367 regarding related state allegations.

1 2. Venue is proper within the Central District of California pursuant to 28
2 U.S.C. 1391 (b) (1) and (2) in that several defendants reside therein and many of the acts
3 alleged as a pattern of racketeering are alleged to have been planned and implemented in
4 this district.

5
6 3. At all times mentioned herein, Plaintiff resided in Los Angeles County,
7 California. Plaintiff is now

8 **ALLEGATION OF JURISDICTON**
9

10 4. The Plaintiff Hunter resides in Los Angeles, and the Defendants' are
11 employed as officials, successors, agents, and/or authorities authorized and/or licensed in
12 the United States State having their principal place of business in the States of California
13 and New York. The matter in controversy exceeds the sum of \$10,000 dollars.

14 **PARTIES**
15

16 5. The Plaintiff Dannez Hunter, is a resident of Los Angeles located at 3414
17 W. Washington Blvd., Ste #2, Los Angeles, CA 90018.

18
19 6. Defendant Quentin Tarantino is a resident of Los Angeles and utilized
20 Miramax, Visionia Romantica, Walt Disney, and A Band Apart as the criminal
21 enterprise existing and doing business under the laws of the State of California, and
22 located at 11812 San Vicente Blvd., 4th Floor, Los Angeles, CA 90049, and engaging in
23 business in said state, including having distributed more than 10 copies of fraudulently
24 procured copyright material in the states of California.

25 7. Defendant Visiona Romantica Inc. is a Corporation existing and doing
26 business under the laws of the State of California, and located at c/o Mark D. Friedman,
27 11812 San Vicente Blvd., 4th Floor, Los Angeles, CA 90049 and engaging in business in
28

1 said state, including having distributed more than 10 copies of fraudulently procured
2 copyright material in the states of California.

3
4 7.5 Carlos Goodman, is a Lawyer existing and doing business under the laws of
5 the State of California, and located 150 S. Rodeo Dr. 3rd Fl, Beverly Hills, CA 90212-
6 2403, and engaging in business in said state, and executed his name on the copyright
7 PAu002655537 material in the states of California.

8 8. Defendant Miramax is a Corporation existing and doing business under the
9 laws of the State of California, and located at c/o Corporation Service Company, 80
10 State Street, Albany, New York, 12207-2543, 161 Avenue of the Americas, 15 Floor,
11 New York, N.Y. 10013-2338, and engaging in business in said state, including having
12 distributed more than 10 copies of fraudulently procured copyright material in the states
13 of California and New York.

14 9. Defendant The Walt Disney Company is Corporation existing and doing
15 business under the laws of the State of California, and located at , c/o Marsha L. Reed,
16 500 S. Buena Vista Street, Burbank, CA 91521 and engaging in business in said state,
17 including having distributed more than 10 copies of fraudulently procured copyright
18 material in the states of California.

19 10. Defendant A Band Apart is a Corporation existing and doing business under
20 the laws of the State of California, and located at c/o Lawrence Bender, 8530 Wilshire,
21 Ste 500 Beverly Hills, CA 90211, or c/o Lawrence Bender 325 N Faring Rd LA CA
22 90077 and engaging in business in said state, including having distributed more than 10
23 copies of fraudulently procured copyright material in the states of California.

24 11. Defendant Lawrence Bender Productions is a Corporation existing and
25 doing business under the laws of the State of California, and located at 8530 Wilshire,
26 Ste 500 Beverly Hills, CA 90211, or c/o Lawrence Bender 325 N Faring Rd LA CA
27 90077 and engaging in business in said state, and received proceeds and revenue from
28 "Kill Bill."

12 Defendant Lawrence Bender is a resident existing and doing business under the laws of the State of California, and located at A Band Apart/Lawrence Bender Productions 8530 Wilshire, Ste 500 Beverly Hills, or 325 N Faring Rd LA CA 90077 and engaging in business in said state, and received proceeds and revenue from "Kill Bill."

13. Defendant Bob Weinstein, is an individual existing and doing business under the laws of the State of New York, and located at 345 Hudson Street, 13th Floor, New York, N.Y. 10014; or 375 Greenwich Street, New York, New York, 10013 and engaging in business in said state, including having distributed more than 10 copies of fraudulently procured copyright material in the states of California.

14. Defendant Harvey Weinstein, is an individual existing and doing business under the laws of the State of New York, and located at 345 Hudson Street, 13th Floor, New York, N.Y. 10014; or 375 Greenwich Street, New York, New York, 10013 and engaging in business in said state, including having distributed more than 10 copies of fraudulently procured copyright material in the state of New York.

14.5 Defendant The Weinstein Company existing and doing business under the laws of the State of New York, and located at 345 Hudson Street, 13th Floor, New York, N.Y. 10014; 375 Greenwich Street, New York, New York, 10013 and engaging in business in said state, including having distributed more than 10 copies of fraudulently procured copyright material in the state of New York.

15. Defendant s John Does I through X are employed at Miramax, A Band Apart, and Visiona Romantica existing and doing business under the laws of the State of California, and located at and engaging in business in said state, including having distributed more than 10 copies of fraudulently procured copyright material in the state of California.

INDIVIDUAL ALLEGATIONS OF PLAINTIFF

16. On May 5, 1999, Plaintiff deposited a recorded copy of his Lotus Treatment with the Writers Guild of America, #746205 with a fictional character therein named Ren based on the historical lineage of Samurai "Sakanouye No Tamuramaro," who is

1 one of the most distinguished Black rulers and warriors in antiquity. After registering
2 the Lotus treatment, in May of 1999, Plaintiff went to Mandalay Pictures located on the
3 Paramount Pictures lot to first "Pitch" the Lotus treatment to colleagues within the
4 development department. The Lotus treatment was given extremely high accolades by
5 Adam Stone, Director of Development at Mandalay. Adam informed Plaintiff that
6 although the Lotus Treatment was excellent, the content was outside the genre of films
7 that Mandalay distributed.

8 17. Around or about May and June of 1999, Plaintiff being an inner city youth
9 took a bus to Miramax located at the time 7966 Beverly Boulevard to meet with a former
10 co-worker / Non-Defendant named Anna Wong, for lunch. Anna Wong worked for
11 Miramax. Prior, Anna Wong trained Plaintiff as a Minority Management Trainee / Intern
12 within Warner Bros. International Real-Estate division. Her Sensei's name is Benny The
13 Jet. Subsequently, A Band Apart was functioning and operating inside the same building
14 as Miramax, but the Plaintiff doesn't know if Visionia Romantica was also in the same
15 building. After lunch, Plaintiff provided Non-Defendant Anna Wong with a copy of the
16 Lotus Treatment while standing inside Miramax on the second floor and graciously
17 requested for her to run the treatment through Miramax coverage and give the Lotus
18 treatment to Defendant Quentin Tarantino.

19 18. The Plaintiff asserts and alleges Defendant Tarantino copied verbatim the
20 CONCEPT/CHARACTER name "Ren," without changing anything and pilfered every
21 element from the Lotus treatment, including Ren witnessing her mother's sadistic
22 murder in a cartoon format, the knife through the mother's abdomen that went inches
23 away from her face with droplets of blood on her face as she gasped for breath, burning
24 the house down while standing next to the small shrine, Ren becoming the head of the
25 Yakuza, the collection of the Katana swords, the death touch, the esthetic look of the
26 cover-page treatment marketing plan, and her being taken by her father to be trained by
27 her grandfather to become an assassin. The Plaintiff asserts and alleges Tarantino copied
28 verbatim more than an hour of Hunter's treatment including Ren wearing an all black
outfit. The Plaintiff asserts he placed the copyright symbol on the cover page of the

1 treatment that was ignored by Tarantino. At different intervals the "O" was placed before
 2 Ren at the beginning of her name to show politeness and respect by those who was
 3 scared of her:

4 <http://www.youtube.com/watch?v=uLtVp3aBPWY>

5 [http://www.youtube.com/watch?v=NfywvogGZag&feature=rec-LGOUT-](http://www.youtube.com/watch?v=NfywvogGZag&feature=rec-LGOUT-exp_fresh+div-1r-4-HM)
 6 [exp_fresh+div-1r-4-HM](http://www.youtube.com/watch?v=NfywvogGZag&feature=rec-LGOUT-exp_fresh+div-1r-4-HM)

7 <http://www.youtube.com/watch?v=gktyzYvyyck&feature=related>

8 19. The Plaintiff asserts and alleges prior to giving his Lotus treatment to
 9 Defendant Tarantino, he had applied for several jobs with Miramax and was never given
 10 a return phone call, as numerous similar situated less qualified Jewish and White people
 11 were bestowed job after job after job. The Plaintiff asserts and alleges in June, October
 12 28, and November 15, 2009, he contacted Tarantino and attempted to get him to pay him
 13 royalties and correct the application with the U.S. Copyright Office; however, due to
 14 discrimination based on Racial Animus, Tarantino refused to pay Hunter any royalties
 15 after making over \$332 million dollars in worldwide sales and correct the copyright
 16 application with the Register of Copyrights amounting to desparate impact and
 17 treatment.

18 20. The Plaintiff asserts and alleges Tarantino, Miramax, Visiona Romantica,
 19 and A Band Apart story boarded his Lotus treatment in a cartoon format and then placed
 20 the treatment in storage.

21 21. In light of the nature of the business, and pressures of this world, Plaintiff
 22 lost faith in his abilities and unfortunately had an encounter with the LAPD Rampart
 23 Division on January 11, 2001. As a result the Plaintiff was incarcerated until March 17,
 24 2006 and could not find out about the Tarantino committing the theft until a year and a
 25 half later.

26 **RICO ENTERPRISE**

27 22. The Plaintiff asserts and alleges that on 2002-05-08, Defendant Tarantino,
 28 under Visiona Romantica knowingly and willfully filed a Fraudulent and False copyright
 PAu002655537 with the United States Copyright office that failed to disclose Hunter's

1 name as the Source author, while ignoring the copyright symbol on the front page of the
 2 Lotus treatment from which Tarantino copied verbatim the entire PLOT/CONCEPT for
 3 "Ren/Kill Bill". The Plaintiff asserts and alleges the Defendants Tarantino submitted
 4 "False official applications" to the copyright office in violation of 18 U.S.C. 1001, which
 5 is an antitrust problems under 15 U.S.C. 1. The Plaintiff asserts and alleges these
 6 activities were commenced to "Restraining" Hunter's ability to "Trade," ("Emphasis
 7 Added"), because of the color of his skin compared to similar situated Whites and/or
 8 Jews constituting a combination and "Conspiracy Against Trade," a "Federal Crime" and
 9 a civil violation on the basis for relief under 15 U.S.C. 1 and 15. Failure of Tarantino to
 10 make corrections of material omissions in a copyright registration is a violation of 17
 11 USC 409. The Plaintiff asserts and alleges the copyright registration must be evaluated
 12 as a "False Registration" of authorship under 18 U.S.C. 1001 (a) (1) and 17 U.S.C. 506
 13 (e). Tarantino TYPED ("Emphasis Added") in his name on "space 8" ("Emphasis
 14 Added") of the copyright application, instead of executing his personal signature on the
 15 copyright application in a calculated attempt to personally avoid Felony Copyright
 16 Infringement. Such a crime reflects malice aforethought and premeditation. The Plaintiff
 17 asserts and alleges Tarantino had Carlos Goodman execute his name of the copyright
 18 application, instead of Tarantino personally signing the copyright application. Through
 19 an initial search on the U.S. Copyright data base Quentin Tarantino's name can no
 20 longer be found with the "Kill Bill" copyright, and it's now listed solely under Visiona
 21 Romantica.

22 23. The Plaintiff asserts and alleges said Defendants Tarantino, Visiona
 23 Romantica, A Band Apart, Lawrence Bender, and Miramax, Bob Weinstein and Harvey
 24 Weinstein made "willful infringements" under section 506 (a) which is supported by
 25 false copyright registrations in violation of 18 U.S.C. 1001 and mail fraud through 18
 26 U.S.C. 1341 which is used to siphon revenues away from the "substantial contributing
 27 author" contributing author of the work." The Plaintiff asserts and alleges the
 28 Defendants Tarantino and Visiona Romantica used false registrant of the original work

1 to make modifications to the original work but left it as substantially equivalent to the
2 original work." Copyright Predicate in Accordance with 17 U.S.C. 411 (a)"

3 24. The Plaintiff asserts and alleges Defendant Tarantino due to discrimination
4 based on Race changed the Ren character who is an African/Japanese to a VILLIAN that
5 is a Chinese/Japanese character, while simultaneously switching the attributes of Ren to
6 the Jewish superhero and hiring less than 1% percent African-Americans for the
7 production of "Kill Bill." Thereafter, Tarantino had the Jewish character kill my
8 Japanese/Black character Ren and chopped up her body parts / arms and threw her into a
9 ditch to signify cutting off the arms of the Black author, thus amounting to
10 discrimination based on Race compared to similar situated White Males authors. The
11 Plaintiff asserts Tarantino killed off his Black/Japanese character in order to block
12 Hunter from being able to create other plots based on said character, thus equating to
13 Restraint of Trade. (Violations: Buchwald v. Paramount Pictures, 1990 WL 357611 (Cal.
14 Superior))

15 25. It is not necessary to show theft and use of the entire story by Tarantino. It
16 is only necessary to prove access and copying of specific portions by Defendant
17 Tarantino where the "substantial contributing author" was omitted from the copyright
18 registration; in order, for me to "NULLIFY" the fraudulent copyright for a violation of
19 17 U.S.C. 408 (d) and 18 U.S.C. 1001. Indeed, Plaintiff asserts and alleges Defendant
20 Tarantino was required to disclose Hunter's name and work as the "substantial
21 contributing author" in paragraph 6 of the related copyright application. In this
22 circumstance, the copyright registration in question would be materially false regarding
23 the issue of authorship. This willful failure to disclose Hunter's contribution makes the
24 copyright registration invalid and unlawful under 18 U.S.C. 1001 for willfully "failing to
25 reveal" that the "substantial contributing author" was omitted with the intent to deny
26 Plaintiff credit, and royalties in the project. The Plaintiff asserts and alleges the issue of
27 authorship is significant regarding each aspect of the registered work under 17 U.S.C.
28 201.

1 26. The Plaintiff asserts and alleges Defendants Tarantino, Visiona Romantica
 2 Inc, Miramax, A Band Apart, Lawrence Bender, Walt Disney, Bob Weinstein, and
 3 Harvey Weinstein failed to disclose the usage of the creative work of Hunter, and
 4 constitutes a combination and "Conspiracy" to "Restrained Trade," because of the color of
 5 his skin by filing a fraudulent application with the Copyright Office for a registration on
 6 a story written by another author without disclosing the use of Hunter's work as the
 7 source.

8 27. The Plaintiff asserts and alleges Tarantino, and Visiona Romantica, Inc.
 9 fraudulently filed an application for a copyright with the Copyright Office for a
 10 registration on a story written by Hunter without disclosing the use of Hunter's work as
 11 the source / substantial contributing author, and Tarantino did so through the mail and/or
 12 by electronically wiring the application to the Copyright Office, thus equating to
 13 Restraint of Trade.

14 28. The Plaintiff asserts and alleges Bob and Harvey Weinstein deliberately
 15 structured their departure from Miramax to be March 30, 2005 which is the first
 16 fingerprint of a crime scene. The Plaintiff was suppose to be released from prison on
 17 March 17, 2005; however, the time frame was extended an entire year. The Plaintiff
 18 asserts Bob and Harvey Weinstein structured their Golden Parachute to depart Miramax
 19 in December of 2005, which is the second fingerprint. Thereafter, the Plaintiff asserts
 20 and alleges that Miramax closed it's offices on Beverly Blvd., and suspiciously took the
 21 numbers off of the side of the building, of which is the third fingerprint involving a
 22 crime scene. (Emphasis Added) For there to be a crime, the commission of prohibited act
 23 and criminal intent (*mens rea*) have to concur in time. As a result of taking the numbers
 24 off of the side of the building, it made Plaintiff think that Bob and Harvey Weinstein
 25 were aware of Tarantino's theft of the Lotus treatment. The Plaintiff asserts and alleges
 26 Miramax moved to New York, and Bob and Harvey Weinstein started The Weinstein
 27 Company with proceeds from Kill Bill volumes I and II. The Plaintiff asserts and alleges
 28 that Quentin Tarantino and Lawrence Bender for A Band Apart staged being broke after
 making more than \$332 million dollars in world wide gross revenues, while Quentin

1 Tarantino departed from A Band Apart. Thereafter, Lawrence Bender utilized proceeds
 2 from Kill Bill for Lawrence Bender Productions. The Plaintiff asserts and alleges that
 3 Quentin Tarantino utilized proceeds from Kill Bill to finance future films.

4 29. The Plaintiff asserts and alleges the Defendants Tarantino in violation of
 5 RICO, made a series of willfully false copyright registrations with the Copyright Office
 6 in violation of 18 U.S.C. 1341, 18 U.S.C. 1001 (a) (1), 17 U.S.C. 409 (1) and (9), 17
 7 U.S.C. 408 (d), and 17 U.S.C. 506 (e). The Plaintiff asserts and alleges said Defendants
 8 in violation of RICO, made "willful infringements" under section 506 (a) which is
 9 supported by false copyright registrations in violation of 18 U.S.C. 1001 and mail fraud
 10 through 18 U.S.C. 1341 which is used to siphon revenues away from the true creator of
 11 the work," and restrain Hunter in his ability to trade and talent. The Plaintiff asserts and
 12 alleges the Defendants used false registrant of the original work to make modifications to
 13 the original work but left it as substantially equivalent to the original work." Copyright
 14 Predicate in Accordance with 17 U.S.C. 411 (a).

15
 16 "Now, Tramontana is angry. Over at the website for the 2003 film,
 17 therealgrindhouse.com, you'll discover that Tramontana is very serious, saying:
 18 "Quentin Tarantino is a thieving **PIECE of SHIT** and he knows it. He stole
 19 Grindhouse from a bunch of kids who were just asking for his help and he
 20 helped them by stealing their **TITLE** and **CONCEPT**." Whoa!"

21
 22 Tarantino has come under criticism for his use of racial epithets in his films,
 23 particularly the word "n****r" in Reservoir Dogs and Pulp Fiction, most notably
 24 from Black American director Spike Lee. In an interview for Variety, Lee said: "I'm
 25 not against the word... and I use it, but Quentin is infatuated with the word.

26
 27 TARANTINO: "**Hey! I can use fucking elements from other movies! It's not a**
 28 **ripoff, it's an homage!**" (http://uncyclopedia.wikia.com/wiki/Quentin_Tarantino)

1 TARANTINO: "I steal from every movie ever made."

2 30. Quentin Tarantino is avoiding service of the lawsuit by not having a stable
3 business address registered with the California Secretary of State, and he is not listed in
4 the Hollywood Creative Directory.

5 31. The Plaintiff asserts and alleges he gave no consent to either Tarantino,
6 Visiona Romantica Inc, Miramax, A Band Apart, Lawrence Bender, Walt Disney, Bob
7 Weinstein, and Harvey Weinstein to use the story concept, characters, and plot, without
8 payment and royalties in reference to his registered work with the Writer's Guild of
9 America.

10 32. The Plaintiff asserts and alleges that all major companies such as Miramax
11 keep an electronic filing of the coverage and the hard copy of all treatments and scripts
12 submitted to the Studio. The Plaintiff does not know if Visiona Romantica was operating
13 in the same building as Miramax; however, Plaintiff Hunter asserts Visiona Romantica is
14 a part of the criminal enterprise.

15 33. The Plaintiff asserts and alleges that Tarantino entered into negotiations to
16 make the next volume of Kill Bill without informing Hunter that he would allot Hunter
17 credit and pay future royalties, as well as, correct the application filed with the U.S.
18 Copyright Office amounting to discrimination based on Racial Animus that has caused
19 an extreme financial hardship/injury to Hunter.

20 34. The Plaintiff Hunter asserts and alleges that he contacted Tarantino through
21 Visiona Romantica, and The Walt Disney Company and they all refused to give Hunter
22 any royalties, credit, because he is an African American compared to similar situated
23 Whites and/or Jews with intent to Restrain Hunter in his talents and trade, because of the
24 color of his skin.

25 35. In sequence order, the Plaintiff asserts and alleges Tarantino copied
26 verbatim his Lotus treatment knowing that the original writer is an African American,
27 concealed that Ren is an African American/Japanese character in the Kill Bill movies,
28 Dead "N****r" Storage ("DNS") is subtly referenced in 14 separate Quentin Tarantino
movies including Reservoir Dogs and the two Kill Bill films, Killed off my Ren